

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Twanda Marshinda Brown, <i>et al.</i> , Plaintiffs, v. Lexington County, South Carolina, <i>et al.</i> , Defendants.	Civil Action No. 3:17-cv-01426-MBS-SVH
--	---

**STIPULATION OF VOLUNTARY DISMISSAL OF DEFENDANT ROBERT MADSEN
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs and Defendants, by and through their respective counsel, hereby stipulate and agree that all claims against Defendant Robert Madsen in the above-captioned case are dismissed without prejudice and without an award of fees or costs to any party. This stipulation does not affect any claim against any other named Defendant in this case.

DATED this 16th day of May, 2018.

[Signature blocks are on the following page]

Respectfully submitted by,

s/ Susan K. Dunn
SUSAN K. DUNN (Fed. Bar # 647)
American Civil Liberties Union Foundation
of South Carolina
P.O. Box 20998
Charleston, South Carolina 29413-0998
Telephone: (843) 282-7953
Facsimile: (843) 720-1428
Email: sdunn@aclusc.org

NUSRAT J. CHOUDHURY, *Admitted pro hac vice*
CARL G. SNODGRASS, *Admitted pro hac vice*
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, New York 10004
Telephone: (212) 519-7876
Facsimile: (212) 549-2651
Email: nchoudhury@aclu.org
Email: csnodgrass@aclu.org

TOBY J. MARSHALL, *Admitted pro hac vice*
ERIC R. NUSSER, *Admitted pro hac vice*
Terrell Marshall Law Group PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103
Telephone: (206) 816-6603
Facsimile: (206) 319-5450
Email: tmarshall@terrellmarshall.com
Email: eric@terrellmarshall.com

Attorneys for Plaintiffs

s/ Kenneth P. Woodington
KENNETH P. WOODINGTON
Fed. I.D. No. 4741
WILLIAM H. DAVIDSON, II
Fed. I.D. No. 425

DAVIDSON & LINDEMANN, P.A.
1611 DEVONSHIRE DRIVE, 2ND FLOOR
POST OFFICE BOX 8568
COLUMBIA, SOUTH CAROLINA
29202-8568
wdavidson@dml-law.com
kwoodington@dml-law.com
T: 803-806-8222
F: 803-806-8855

Attorneys for Defendants